

# EXHIBIT 40

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GRAHAM CHASE ROBINSON

Plaintiff,

v.

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,  
Defendants.  
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AUDIO TRANSCRIPTION  
ROBINSON7174 (MARCH 27, 2019)  
27:26 - 28:13

MAGNA LEGAL SERVICES  
320 West 37th Street, 12th Floor  
New York, New York 10018  
(866) 624-6221

Reported by: Marissa Mignano  
Job Number: 891023

1 Audio Transcription

2 TOM HARVEY: What's up.

3 CHASE ROBINSON: Any advice?

4 TOM HARVEY: Just ignore it  
5 and stay away from her.

6 CHASE ROBINSON: I'm -- I'm trying  
7 to, but the more I stay away from her --  
8 and I've got to send you the second one.  
9 The second one is worse.

10 TOM HARVEY: What?

11 CHASE ROBINSON: The second one --  
12 the e-mail she sent me was worse. I  
13 just forwarded it to you.

14 TOM HARVEY: I mean it's -- it's  
15 -- she's just -- she's out of her  
16 fucking mind.

17 CHASE ROBINSON: I mean, I -- at  
18 this point, it's just like I feel like  
19 I'm just constantly, like, harassed and  
20 I'm constantly, like -- she's saying  
21 things about me to Bob that aren't true.  
22 I just, like -- I just don't know what  
23 to do. Like, I've tried to be as  
24 helpful as I possibly can, but, like,  
25 there's only, like, a limit that you --

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2 I mean, Kap is --

3 TOM HARVEY: No, she seems to have  
4 this issue with everyone.

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C E R T I F I C A T E  
STATE OF NEW YORK )  
: SS  
COUNTY OF NEW YORK)

I, Marissa Mignano, a Notary  
Public within and for the State of New York,  
do hereby certify the within is a  
a true and accurate transcription of the  
audiotapes recorded.

I further certify that I am  
not related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of this  
matter.

IN WITNESS WHEREOF, I have  
hereunto set my hand this 25th day of  
October 2022.

*Marissa Mignano*

MARISSA MIGNANO

-----  
GRAHAM CHASE ROBINSON

Plaintiff,

v.

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,  
Defendants.  
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AUDIO TRANSCRIPTION  
ROBINSON7174 (MARCH 27, 2019)  
32:28 - 33:08

MAGNA LEGAL SERVICES  
320 West 37th Street, 12th Floor  
New York, New York 10018  
(866) 624-6221

Reported by: Marissa Mignano  
Job Number: 891023

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2

ROBIN CHAMBERS: Hello.

3

CHASE ROBINSON: Hi.

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ROBIN CHAMBERS: Hey.

5

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CHASE ROBINSON: I just got off  
with Tom. He's going to call me back in

7

an hour. He said -- but I kind of went

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through, like -- I sent him the e-mails

9

and I said, look, this is, like, sort

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of, you know, it's -- you know, it's

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harassment in a way. And it's also,

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like, so much of it is untrue. It's not

13

my job and, like, I don't know what to

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do. What advice should I use?

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He's like, Do you think Bob just  
disregards these e-mails and doesn't,

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like, you know, do anything? Do you

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think that he just throws them away?

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ROBIN CHAMBERS: Yeah.

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21

CHASE ROBINSON: He goes, she's a  
Taekwondo. How do you go from that to

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an ogre, like, you know, he's just kind

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of, you know -- I really don't know what

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to do.

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AUDIO TRANSCRIPTION  
ROBINSON7174 (MARCH 27, 2019)  
47:23 - 47:55

MAGNA LEGAL SERVICES  
320 West 37th Street, 12th Floor  
New York, New York 10018  
(866) 624-6221

Reported by: Marissa Mignano  
Job Number: 891023

1 Audio Transcription

2 MICHAEL TASCH: Right.

3 CHASE ROBINSON: I mean, I think  
4 Bob -- I think Bob knows -- I mean, Bob  
5 of course knows that, like, I'm not --  
6 I'm always trying to be helpful, and I'm  
7 always bending over backwards. But  
8 like --

9 MICHAEL TASCH: Right. Right.

10 CHASE ROBINSON: I mean, when you  
11 get these e-mails, it's just plain  
12 harassment is what it is.

13 MICHAEL TASCH: Yes, it is, Chase,  
14 exactly.

15 CHASE ROBINSON: It's  
16 harassment --

17 MICHAEL TASCH: It's exactly  
18 harassment.

19 CHASE ROBINSON: It's harassment  
20 and it's -- it's -- they're complete  
21 lies.

22 MICHAEL TASCH: This is a clear --  
23 this is a clear chain of e-mails not  
24 only to me, and she started sending to  
25 Mark, and to you -- in theory, we could

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2           sue her for this, Chase.

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